

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS

GPM INDUSTRIAL INC.
a Florida corporation,

CASE NO.:16-CV-01129

Plaintiff,
vs.

PDVSA SERVICES, INC., a Delaware
Corporation, and BARIVEN, S.A.
d/b/a BARIVEN CORP, a foreign corporation.

Defendants.

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**PLAINTIFF'S STATUS REPORT AND AGREED MOTION ON BRIEFING
SCHEDULE FOR PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

Plaintiff, GPM INDUSTRIAL INC., a Florida corporation, by undersigned counsel files its Status Report and Agreed Motion on Briefing Schedule for Plaintiff's Motion for Summary Judgment and hereby states as follows:

1. Undersigned counsel and counsel for Defendant PDVSA Services, Inc. ("PDVSA") have conferred. Counsel for PDVSA has received guidance subsequent to entry of this Court's Order Granting Plaintiff's Motion for Sixty Day Stay of Case [D.E. 59] and believes that he may now continue to represent his client in this matter without violating any laws or Executive Orders.
2. The parties therefore request that this court set a date sixty (60) days from the date of its Order on this Motion allowing counsel for Defendant to file a response to Plaintiff's Motion for Summary Judgment [DE 53].
3. Granting this motion will not create any delay or unduly prejudice for either party.

Dated on June 28, 2019.

Respectfully submitted,

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**ATTORNEYS FOR PLAINTIFF
GPM INDUSTRIAL, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this instrument has been forwarded to all known parties of record as indicated below, in accordance with the Federal Rules of Civil Procedure on this 9th day of July 2019.

Mr. Brock Akers
The Akers Firm PLLC
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In the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notice of Electronic Filing.

s/Caldwell Fletcher
Caldwell Fletcher